



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 7, 2021

By ECF

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Martinez-Aguilar, et al., 20 Cr. 333 (LTS)*

Dear Judge Swain:

Pursuant to the Court's direction and on behalf of all parties, the Government writes respectfully to request an adjournment for approximately thirty (30) days of the conference currently scheduled for February 11, 2021, at 2:00 PM. The Government has conferred with counsel for all defendants, and no party has objected to an adjournment of the conference.¹

Further, the Government requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h), through any newly-scheduled date in order to permit the defendants to continue reviewing discovery, and to allow for discussions with the Government concerning any potential pretrial resolutions. No party has objected to the exclusion of time.²

¹ Counsel for defendants Jose Sergio Martinez-Aguilar, Vladimir Pulstilinkov, Sebastian Ramos and Ricardo Ruiz-Salinas have indicated they have no objection to the adjournment. Counsel for defendant Miguel Lovos has not taken a position with respect to the adjournment.

² Counsel for defendants Martinez-Aguilar, Lovos, Pulstilinkov, and Ramos consent to exclude time. Counsel for defendant Ruiz-Salinas has not taken a position as to the exclusion of time.

Accordingly, the Government respectfully requests that the conference currently scheduled for February 11 be adjourned for approximately thirty days, and that time be excluded through the date of the new conference.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney
Southern District of New York

by: _____ /s/
Jarrod L. Schaeffer
Rushmi Bhaskaran
Assistant United States Attorneys
Tel.: (212) 637-2270 / 2439

cc: Counsel of Record (via ECF)

The application is granted. The conference is adjourned to March 8, 2021, and 12:00 p.m. The Court finds pursuant to 18 U.S.C. §3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through March 8, 2021, outweigh the best interests of the public and the defendant(s) in a speedy trial for the reasons stated above. DE#68 resolved.

SO ORDERED.

Dated: 2/8/2021

/s/ Laura Taylor Swain, USDJ